

Exhibit N

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ELIZABETH HORTON)
)
Plaintiff,)
)
v.)
)
DON WILLIAMS, individually and)
in his capacity as the Manager of)
National Seating and Mobility, Inc.,)
NATIONAL SEATING AND) **CIVIL ACTION NUMBER:**
MOBILITY, INC., GERALD) **2:06-cv-526-MHT-TFM**
SHOCKLEY, individually and in his)
capacity of a special agent of the)
Alabama Attorney General's Office,)
)
Defendants.)

NOTICE OF DEPOSITION DUCES TECUM

Please take notice that defendant **National Seating and Mobility** will take the deposition on oral examination of Elizabeth Horton, before a notary public or other officer authorized to administer oaths. The deposition will continue from time to time until completed. You are invited to attend and cross examine.

Deponent: **Elizabeth Horton**

Date: **November 1, 2007**

Time: **9:00 a.m.**

Location: **Bradley Arant Rose & White LLP**
 401 Adams Avenue, Suite 780
 Montgomery, AL 36104

Pursuant to Federal Rules of Civil Procedure Rule 30(b)(1), the deponent is requested to bring to the deposition the documents or things listed in Schedule A attached to this deposition notice.



Charles A. Stewart III (STE067)
Bradley Arant Rose & White LLP
The Alabama Center for Commerce
401 Adams Avenue, Suite 780
Montgomery, AL 36104
Telephone: (334) 956-7700
Facsimile: (334) 956-7701

Elizabeth B. Mitchell (BRI050)
Bradley Arant Rose & White LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, AL 35203-2104
Telephone: (205) 521-8000
Facsimile: (205) 521-8800

**Attorneys for Defendant
National Seating & Mobility, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2007, I mailed by United States Postal Service this document to the following:

Deborah M. Nickson
Attorney for Plaintiff
2820 Fairlane Drive, Suite A-10
Montgomery, Alabama 36116

Dorman Walker
Balch & Bingham
P.O. Box 78
Montgomery, AL 36101

Jack W. Wallace, Jr.
Office of the Attorney General
11 South Union Street
Montgomery, AL 36130



Charles A. Stewart III (STE067)
Bradley Arant Rose & White LLP
The Alabama Center for Commerce
401 Adams Avenue, Suite 780
Montgomery, AL 36104
Telephone: (334) 956-7700
Facsimile: (334) 956-7701

Schedule "A"

Documents To Be Produced At The Deposition Of

Elizabeth Horton

1. Please identify and produce any and all statements taken from any party which relate in any way to this lawsuit or the allegations in your Complaint.
2. Please identify and produce any and all tangible items gathered or retained as a result of the claims made the basis of your lawsuit.
3. Please identify and produce a listing of all damages you complain have been incurred as a result of the claims made the basis of this lawsuit.
4. Please identify and produce any and all reports of experts you have retained for the prosecution of this suit.
5. Please identify and produce any and all correspondence between you and any of the Defendants.
6. Please identify and produce each and every document requested by you from a third-party in the prosecution of this case.
7. Please identify and produce a copy of each and every document requested in the interrogatories filed by Defendant.
8. Please identify and produce each and every document which you allege substantiates the contentions set forth in your Complaint.
9. Please identify and produce any and all federal and state income tax returns filed by you for the five-year period immediately preceding the date of your termination from National Seating and Mobility up to and including the most recent return filed.

10. Please identify and produce any and all investigative reports and written or recorded statements, to the extent not done so above, compiled in your prosecution of this lawsuit.

11. Please identify and produce a copy of any and all documents consulted, referred to, or otherwise utilized in any way in connection with the preparation of your responses to Defendant's interrogatories and/or requests for production.

12. Please identify and produce any and all documents that reflect, relate to, or arise out of any of the facts that form the subject matter of this litigation.

13. Please produce any and all documents or materials that you have collected for this case from an individual or entity other than Defendant, including, but not limited to, depositions, trial transcripts, and documents relative to all defendants and/or their expert witnesses in this case.

14. Please produce any tape recordings or statements you have taken of any party or witness relating to this case.

15. Please produce any photos, videotapes, or recordings of any person, place, or thing which has been created for this lawsuit or which relates to the issues in this case.

16. Please produce the most recent photograph of Plaintiff in your possession.

17. Please identify and produce a list of the medical care providers you have seen in the past ten years relating to the damages you claim in your complaint.

18. Please produce all documents relating to the medical care you received from those individuals identified in response to preceding request.

19. Please identify and produce as list of all medical care providers you have seen in the past ten years.

20. Please produce all documents relating to the medical care you received from those individuals identified in response to preceding request in your possession or control.

21. Please identify and produce a list of all counselors, lay counselors, psychologists, psychiatrists you have seen in the past ten years.

22. Please produce all documents relating to the care you received from those individuals identified in response to preceding request in your possession or control.

23. Please identify and produce all records relating to your arrest and prosecution including all exhibits used at your trial.

24. Please identify and produce a list of the names and addresses of all employers past and present including the name of your immediate supervisor and the dates you were employed at each and the reason for your leaving said employment.

25. Please produce a copy of all prescriptions or the front label off of prescription containers of any medicine or drug that you are currently taking or have taken within the last two years.